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September 6, 2019

Mr. Dennis Lee
Program & Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Ave, 2nd Floor
San Francisco, CA 94102

Dear Mr. Lee:

The Safety and Enforcement Division (“SED”) of the California Public Utilities Commission conducted a G.O. 112, Operation and Maintenance Inspection of Southern California Gas Company's (“SoCalGas”) Orange North Distribution Area from June 3, 2019 to June 14, 2019. SED conducted field inspections of pipeline facilities in the Downey, Whittier, Anaheim, and La Jolla Distribution districts within the Inspection Unit. SED’s staff also reviewed the Operator Qualification program, which included field observation of randomly selected individuals performing covered tasks.

SED staff identified 2 probable violations and 9 areas of concern. Attached are SoCalGas’ written responses.

Please contact Troy A. Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,

Troy A. Bauer

CC:
Mahmoud Intably, SED
Durga Shrestha, SED
Claudia Almengor, SED

2019 SoCalGas Orange North Distribution Area
6/3/2019 to 6/14/2019

Notice of Probably Violations

- I. SoCalGas' Gas Standard 189.005 "Operation of Odorometer", section 3.1.2. requires employees to have gas sample point with a gas at pressure of 5 psig or less in order to ensure the safety of the equipment and employees. During the field inspection for odor intensity test on June 12, 2019, SED noted that a SoCalGas' employee conducted a gas odorant intensity test without checking the pressure at gas sample point. When SED staff requested that the outlet pressure of the regulator be checked, it was found that the pressure at the gas sample point was 6.2 psig which is higher than the pressure permitted by the Gas Standard. As such, SoCalGas' employee failed to follow the Gas Standard and potentially created an unsafe condition for the testing equipment and SoCalGas' employees. This is a repeated issue and was raised previously in the 2017 G.O. 112-F operation and maintenance inspection of SoCalGas' leak survey program in the Orange North Distribution Area. On December 21, 2017, SoCalGas responded that "SoCalGas will adhere to SED's recommendation and an Information Bulletin will be issued for Gas Operations employee review". SED requested a copy of the Information Bulletin but SoCalGas failed to provide it. Therefore, SoCalGas is in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a) for failure to follow the Gas Standard "Operation of Odorometer"

Response:

SoCalGas will edit the language in procedure 189.005 to read as follows:

"3.1.2 Sample point with gas available at pressure, verified by gauge, of 5 psig or less. If the pressure is higher, an appropriate regulator should be used to adjust pressure to 5 psig or less before proceeding with test."

In addition, a sticker will be placed onto each odorometer near the inlet tube connection reading "5 psi MAX."

In reference to the bulletin, at the time the closure letter for 2017 Orange North Distribution Area was received from SED on February 22, 2018, the procedure had been updated and was published on March 1, 2018 and the notice of publication process requires the qualified and impacted employees review the procedure. An Information Bulletin is normally issued as an interim measure while the Gas Standard is formally updated. In this case, the Gas Standard update was completed and communicated to employees shortly after the SED closure letter was received, superseding the Information Bulletin.

1. During the bridge and span field inspection on June 12, 2019, SoCalGas' technician stated that during these inspections, if a pipeline marker is discovered missing or damaged and if the technician is able to replace or repair it during the inspection, he would mark "no" in the Bridge & Span Inspection Checklist. When asked "Are there any markers missing...?" without recording any corrective action required or having to create any kind of follow up order.

SoCalGas' Gas Standard 184.12 "Inspection of Pipelines on Bridges and Spans", section 2.3. states that *"When any condition is found identified by a "yes" answer*

on the “Bridge and Span Inspection Checklist”, the employee performing the inspection will report the condition to his/her immediate supervisor the same day the condition is discovered.”

According to the Gas Standard above, SoCalGas’ technician is required to assess and record the bridges and spans in the “as-found” condition. SED believes that the technician should have marked it as “Yes” on the Inspection Checklist since the condition was “as-found”, and then the technician should have stated so and properly recorded any corrective action needed.

This issue was raised as a concern and SoCalGas assured SED that it would take corrective actions as appropriate during the 2017 G.O. 112-F inspection of SoCalGas’ Coastal Transmission Area and the 2017 G.O. 112-F inspection of SoCalGas’ leak survey program in the Orange North Distribution Area.

Therefore, SoCalGas is in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a) for failure to follow its Gas Standard “Inspection of Pipelines on Bridges and Spans.”

Response:

SoCalGas will address the reporting of conditions “as-found” that are encountered while performing Bridge and Span Inspections by revising Gas Standard 184.12 “Inspection of Pipelines on Bridges and Spans.” Section 2.3 will be revised to provide clarification that an employee who encounters an “as-found” condition is required to enter “yes” on the “Bridge and Span Inspection Checklist.” Remedial actions taken to address an “as-found” condition will also be recorded on the “Bridge and Span Inspection Checklist.” An Information Bulletin will be circulated to communicate the revisions and to reinforce the reporting requirements for “as-found” conditions that are encountered while performing Bridge and Span inspections.

Concern and Recommendations

- I. During the field inspections of CP facilities, SED observed that the pipe-to-soil reads at the following locations as shown in the table below were out of tolerance (low P/S reads) from its -0.850 volts criterion:

Read point	District	Read, V	SoCalGas’ remedial actions
CP507-2B – Read point M	La Jolla	-0.417	Follow-up order #520002102606 issued
8427 Secura Way, Santa Fe Springs	Whittier	-0.660	P/S read brought up to -1.010 V on 6/12/2019
13548 Pumice St., Norwalk	Downey	-0.480	P/S read brought up to -1.630 V on 6/10/2019
241 E. Imperial, La Habra	Downey	-0.761	Order issued for crew install 1# anode
5412 Gage Ave., Bell Gardens	Downey	-0.493	Not a CP 10 point

6331 Florence Pl., Bell Gardens	Downey	-0.651	Not a CP 10 point
12750 Centralia St., Lakewood, #147	Downey	-0.308	P/S read brought up to -1.630 V on 6/10/2019
12750 Centralia St., Lakewood, #111	Downey	-0.677	P/S read brought up to -1.630 V on 6/10/2019

SED recommends SoCalGas to take the necessary steps to address the out of tolerance CP reads.

Response:

SoCalGas addressed the out-of-tolerance areas and results for areas identified are listed below.

Read point	District	Audit Read, V	Follow-up Read	Follow-up Read Date	SoCalGas' remedial actions
CP507-2B – Read point M	La Jolla	-0.417	-0.950V	7/10/2019	Follow-up SAP order #520002102606 issued. Shorted MSA found and cleared
8427 Secura Way, Santa Fe Springs	Whittier	-0.660	-1.010V	6/12/2019	P/S read brought up to -1.010V on 6/12/2019
13548 Pumice St., Norwalk	Downey	-0.480	-1.630V	6/10/2019	P/S read brought up to -1.630V on 6/10/2019
241 E. Imperial, La Habra	Downey	-0.761	-1.570V	7/05/2019	Follow-up SAP order #100014405673 issued. Anode installed.
5412 Gage Ave., Bell Gardens	Downey	-0.493	N/A	N/A	SoCalGas verified address is not a CP 10 point. Records updated.
6331 Florence Pl., Bell Gardens	Downey	-0.651	N/A	N/A	SoCalGas verified address is not a CP 10 point. Records updated.
12750 Centralia St., Lakewood, #147	Downey	-0.308	-1.630V	6/10/2019	P/S read brought up to -1.630V on 6/10/2019
12750 Centralia St., Lakewood, #111	Downey	-0.677	-1.630V	6/10/2019	P/S read brought up to -1.630V on 6/10/2019

- II. SoCalGas responded that *SoCalGas and SDG&E will move to address 192.605(b)(8) through the Operator Qualification (OQ) program and away from using the D8168 QA Leak Survey Audit and other Self Audit procedures to address this code section. The OQ program provides a better opportunity, while evaluating of employees performing work as part of the OQ evaluation, to also determine the effectiveness and adequacy of the process and procedures. During the evaluation, the evaluator and employee will address the effectiveness and adequacy of the processes and procedures used in normal operations and maintenance.*

The above statement addressed the effectiveness and adequacy of the processes and procedures used in **normal operations and maintenance**. However, it does not address the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found. SED recommends SoCalGas to add language to address abnormal operation processes and corrective actions taken.

Response:

SoCalGas and SDG&E will address 192.605(b)(8) and 192.605(c)(4) through the operator qualification program. During the evaluation, the evaluator and employee will address: 1) the effectiveness and adequacy of the processes and procedures used in normal operations and maintenance; and 2) the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found (Evaluation of AOC's and Reactions).